

UNITED STATES BANKRUPTCY COURT

FOR THE

EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

In re: :  
DONALD WAYNE JACKSON : Chapter 7  
Debtors : Case No. 13-14184-BFK  
\_\_\_\_\_  
: Judy A. Robbins,  
United States Trustee :  
For Region Four :  
Movant :  
v. :  
Donald Wayne Jackson :  
Respondents :  
:

**ANSWER TO MOTION TO DISMISS**

Donald Wayne Jackson, through undersigned counsel,  
respond to the Motion to Dismiss filed by the United States Trustee as follows:

1. The Debtor opposes the United States Trustee's Motion to Dismiss  
only to the extent that the Chapter 7 Trustee is currently selling the Debtor's  
residence. This sale is anticipated to pay the majority of the debts in this case  
and may pay the debts at 100%. The debtor wishes this sale to go forward; if  
unsecured debt remains unpaid, he desires to convert to chapter 13 if needed.

**WHEREFORE, Donald Wayne Jackson prays that the  
Motion to Dismiss by denied.**

**Dated: January 8, 2014**

Respectfully Submitted  
Donald Wayne Jackson  
By Counsel:

/s/ Nathan Fisher  
Nathan Fisher  
3977 Chain Bridge Rd., #2  
Fairfax, VA 22030  
(703) 691-1642  
VSB #37161

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 8<sup>th</sup> day of January 2014, I served the foregoing, via first-class mail, on the following, who are all necessary parties under Local Rule 4001(a)-1(E)(1):

**Donald Wayne Jackson  
11416 Links Drive  
Reston, VA 20190**

**Klinette Kindred, Esq.  
Chapter 7 Trustee  
Tyler, Bartl, Ramsdell & Counts  
300 N. Washington St., Ste. 202  
Alexandria, VA 22314**

**Bradley David Jones  
Assistant United States Attorney  
Office of the United States Trustee  
115 S. Union Street, Ste. 210  
Alexandria, VA 22314**

/s/ Nathan Fisher  
Nathan Fisher

